

# Module 3

## Making the Commitment: Creating an Environmental Policy Statement and Determining the Scope of Your DfE/EMS

This module will help you develop an environmental policy for your company and determine the scope of operation for your DfE/EMS. The discussion questions will help focus your values about the environment and identify which ones might be addressed by your company. A set of principles is also offered, that you may want to include in your statement. A sample environmental policy statement and some examples of other companies' environmental policy statements are presented at the end of the module.

### Environmental Policy Statements

An environmental policy is your declaration of commitment to the environment, including worker health and safety. This policy serves as the foundation for your DfE/EMS and provides a unifying vision of environmental principles that will guide the actions of employees and management. Your environmental policy is a statement of the shared values throughout the company in promoting cleaner, safer workplace practices, products, and technologies. This policy statement serves as the framework for setting environmental objectives and targets, and will be brought to life in your plans and business activities.

Because this statement contains the company's vision, it may include goals that cannot be achieved immediately. This is to be expected, since continuing improvement should be one of the principles included in the policy statement.

### **DfE Program**

Principles that can be a part of your environmental policy include a commitment to risk reduction, pollution prevention, and wise resource management. An important element is a commitment to consider an array of alternatives before determining a course of action.

### **POINTER**

The **environmental policy** is the foundation of the company's EMS. Top management should communicate goals such as preventing pollution and minimizing risk to workers and the environment.

## Discussion Questions

Discuss each of the following questions and make a list of the environmental issues and shared values of concern to your company.

1. What environmental issues are of the greatest concern to your company? For example, consider the air, water, and soil quality, and landfill issues that may be of concern to the surrounding community. Also consider worker health and safety issues.
2. What are the major environmental impacts of your company's operations? Think in terms of air emissions, effluent discharge, solid waste, and natural resource consumption.
3. Who is affected by your company's environmental impacts? Do they occur at a global level, a regional level, a local level? Are there any worker health and safety concerns related to environmental issues, such as using and handling toxic chemicals?
4. Are there significant environmental impacts associated with the **life cycle** of your product as you look upstream and downstream from your operations? For example, (upstream) do your suppliers create significant environmental impact in producing the products you purchase from them ? (Downstream) Do your customers create an impact in using or disposing of the products you sell them? Are these impacts important to you?
5. On a general level, how do you want to accomplish your environmental goals?

### POINTER

Consider who should be involved in developing this policy and the best process for writing it. Input from a range of people in your company will tend to increase commitment and ownership, as well as provide different viewpoints during the policy's creation.

## **Scope of Your Policy Statement and Your DfE/EMS**

### **Refine Your List of Issues**

Review the list of issues generated from the discussion questions and put a check beside those activities your company does or could affect.

### **Set Your Boundaries**

Think also about the boundaries of your policy. Decide if it will include activities beyond internal operations, such as supplier environmental performance or customer product use. You will want to drop issues from your list that do not fall within the boundaries set for your policy statement.

### **Put It Into General Terms**

Your list of specific issues should be addressed in general terms by your policy statement. For example, if chemicals occurring in water or air are a concern because they potentially impact the community, you could express a commitment to review and, where feasible, make changes in the chemicals used by your company. Another example would be that if solid waste in landfills is a concern in your area or to your company, this concern could be expressed as a commitment to reduce the solid waste your company produces.

Next, think about how your commitments will be achieved. For example, your commitment to reduce solid waste may be achieved through a pollution prevention program and a program to design products or services that result in minimal waste generated by the consumer. Also, these programs may be implemented one at a time over a several-year period, as part of your commitment to continuing improvement.

#### **POINTER**

You may wish to review this policy statement when you have completed some of the following modules, e.g., after identifying environmental aspects and determining which of them are significant.

## Sample Commitments

It is important to think through which commitments your company will be capable of addressing. Do not include commitments in your policy that the company will not be able to carry out. The following is a check list of commitments or principles that you may wish to consider including in your policy statement:

Commitment to comply with applicable environmental or worker safety laws/regulations.

Commitment to pollution prevention and prevention of accidents.

Commitment to identify opportunities for risk reduction associated with the processes and chemicals used in your plant, the supplies procured, the products produced, and the disposal of waste products.

Commitment to be aware of the life cycle (from raw materials extraction and processing to use and eventual disposal) of products produced, including packaging, so as to affect how suppliers and end users impact the environment through your products.

Commitment to continuing improvement in use of cleaner technologies and processes, and the safer use of chemicals.

Commitment to wise resource management, including conservation of limited resources and reuse and recycling of materials.

## Examples

The following are sample environmental policy statements that in

### **POINTER**

Visit the DfE website for more tools related to policy statements.

<http://www.epa.gov/opptintr/dfe/index.html>

some way incorporate most of the principles listed above. Case Study #1, below, briefly shows how “Company A” set up a process for creating an environmental policy statement and some of the benefits of doing so.

**Sample Policy: Adapt for your company.**

**YOUR COMPANY (ABC)**

**HEALTH, SAFETY AND ENVIRONMENTAL POLICY**

ABC Company is committed to managing health, safety and environmental (HS&E) matters as an integral part of our business. In particular, it is our policy to assure the HS&E integrity of our processes and facilities at all times and at all places. We will do so by adhering to the following principles:

**Compliance**

We will comply with applicable laws and regulations and will implement programs and procedures to assure compliance. Compliance with HS&E standards will be a key ingredient in the training, performance reviews, and incentives of all employees.

**Risk Reduction, Prevention, Resource Management**

We will seek opportunities, beyond compliance requirements, for reducing risk to human health and the environment, and we will establish and meet our own HS&E quality standards where appropriate.

We will employ management systems and procedures specifically designed to prevent activities and / or conditions that pose a threat to human health, safety, or the environment. We will look for ways to minimize risk and protect our employees and the communities in which we operate by employing clean technology, including safe technologies and operating procedures, as well as being prepared for emergencies.

We will strive to minimize releases to the air, land, or water through use of cleaner technologies and the safer use of chemicals. We will minimize the amount and toxicity of waste generated and will ensure the safe treatment and disposal of waste.

We will manage scarce resources, such as water, energy, land, forests, in an environmentally sensitive manner.

**Communication**

We will communicate our commitment to HS&E quality to our employees, vendors, and customers. We will solicit their input in meeting our HS&E goals and in turn will offer assistance to meet their goals.

**Continuous Improvement**

We will measure our progress as best we can. We will review our progress at least on an annual basis. We will continuously seek opportunities to improve our adherence to these principles, and will periodically report progress to our stakeholders.

{Signature}

President

Date

### Sample Policy

**This is the environmental policy of a small environmental services company specializing in wastewater treatment and laboratory analysis of effluent. The policy is signed by the company's President.**

We supply quality products and services. This requires the commitment of everyone working in this institution to pursue our activities safely, protecting our health and preserving the environment.

To realize this vision we will:

- Establish and review periodically our environmental goals within a program of **continual improvement**.
- Comply with legal requirements pertinent to our industry and with the requirements of other initiatives we enter into in accordance with our commitment to offer quality products and services.
- Conduct laboratory analyses and supply environmental services without risk to workers' health.
- Operate the laboratory with a minimum of waste, in current and future operations.
- Pursue our work with a minimum of disturbance to our neighbors and the community.
- Maintain our vehicles in optimal condition to minimize their consumption of fuel and their emissions to the atmosphere.
- Manage our chemical products safely, principally to prevent spills in their storage and transport.

This policy and any subsequent modifications should be familiar to all employees and available to the public. Implementation of this policy is a primary objective of the President and the responsibility of all employees.

## **Environmental Policy: Module 3**

### **Case Study 1: Company A**

Company A is a 20-person manufacturer of large custom metal machine parts for industrial customers. To initiate its EMS, the company formed a small EMS implementation team that includes the managers of quality, purchasing, and human resources and is led by the owner's son. This team developed the environmental policy for review and approval of the owner and, equally importantly, set up a structure for involving all employees in the EMS process. Employees receive general environmental awareness training during some of the company-wide Friday meetings and have been involved in identifying environmental problems and solutions in their areas of responsibility.

Company A's comprehensive approach to environmental management yielded immediate results. After identifying oil usage as a significant environmental aspect, a team of workers and managers identified faulty gaskets as the primary cause of oil leaking from the machines. By replacing these gaskets, the company cut its oil use by 50%. This change, as well as more general improvements in work environment and worker safety, caused the local environmental enforcement agency to reclassify Company A as a non-hazardous waste generator (it had been classified as a hazardous waste generator). The company also reports significant improvements in the environmental awareness of management and workers; though less tangible, this change in attitude may prove equally significant over the long run.



# Module 4

## **Planning the Process: Decision Points, Leadership & Participants, Schedule & Plan**

This module will help you set up a plan for completing your DfE/EMS. This plan will be unique to your company. You will want to identify:

the steps that need to be taken, in the appropriate order;  
the decisions that will need to be made;  
resources and schedules for accomplishing the tasks; and  
stakeholders that will participate, communication needs,  
and documentation for your EMS process.

### **Planning Steps**

Your review of current environmental activities by your company, discussed in Module 2, gives you some idea of what will need to be done. To plan for your EMS development, consider the steps presented below. You may not be able to complete every step at this time, but addressing them now will facilitate your EMS development.

1. Decide which areas of environmental activities are of the highest priority.
  - ▶ Are there some areas that are critical and need to be addressed first?
  - ▶ Should you work on the EMS in stages?

#### **POINTER:**

The level of detail you want will vary with your organization. Some plans can exist on one page and still be effective.

2. Determine what level of management involvement is required and what decisions will be needed.
  - ▶ Can you proceed with action steps or do you need additional approvals?
  - ▶ Is management aware of its options?
  - ▶ Which decisions can be made by the EMS team and which ones need higher-level management approval?
3. Decide who will be responsible for overseeing completion of various parts of your DfE/EMS. That person will be the “management representative” with responsibility for implementing the EMS (in a small business, this person could be the owner). Someone should be designated as responsible for at least the elements listed below (see worksheet at end of this module):
  - ▶ Identifying and determining significance of environmental aspects.
  - ▶ Identifying and determining applicability of legal and other requirements.
  - ▶ Competency-based training.
  - ▶ Operational controls.
  - ▶ Emergency preparedness and response.
  - ▶ Monitoring and measurement of “key characteristics” of operations and activities that can have significant environmental impacts (i.e., the “significant environmental aspects.”).
  - ▶ Periodic evaluations of environmental compliance.
  - ▶ Handling and investigating non-conformance with the EMS.
  - ▶ Records management.
  - ▶ Internal EMS audits.
4. Decide who should be involved. (See worksheet at the end of this module.)
  - ▶ Do you know what resources you need to complete the

- EMS design?
- ▶ Do you know what resources are available?
  - ▶ Who will make the decision about participants? resources?
  - ▶ How will you define roles, responsibilities, and authorities? The way that will work best is one that is consistent with the way your company is currently managed. Are decisions made centrally, or are they delegated?
5. Set a deadline for developing your EMS and establish a schedule. (See worksheet at the end of this module.)
    - ▶ How much time do you estimate it will take to complete design?
    - ▶ To implement?
  6. Estimate a budget.
  7. Set your boundaries.
    - ▶ How much planning is enough?
    - ▶ How much is too much?

## Create an Outline for the Process

It will be helpful at this point to develop some idea of what your EMS document will look like, and thereby what work will need to be done to fill it in. Create an outline that suits your company. What and how much you actually include depends upon your company and its needs. The following are some of the parts you may want to include:

- I. Environmental Policy
- II. Environmental Action Responsibilities Assignments
- III. Environmental Documents and Their Location
- IV. Environmental Aspects
- V. Significant Aspects
- VI. Legislative and Regulatory Requirements

### **POINTER:**

Spend enough time only to find the major decision points and set some tentative guidelines for how those decisions will be made.

- VII. Objectives and Targets
- VIII. Environmental Program to Meet Objectives and Targets
- IX. Emergency Preparedness Plan
- X. Internal Auditing Procedures
- XI. Corrective Action Procedures
- XII. Program Review Procedures

The actual content of your outline will be filled in as you proceed to develop your EMS.

### Additional Considerations

An important part of the development of your DfE/EMS is the participation of stakeholders; communication with employees, shareholders, and the community; and documentation of your DfE/EMS. Appendices C, D, and E contain information and ideas that will help you consider these three areas as you work through your DfE/EMS. The following three worksheets summarize the kinds of things you will need to consider.

#### **POINTER:**

When creating a plan, add the elements that are suitable for your EMS effort and retain flexibility as the process develops.

<b>Worksheet 4-1: Identification of Stakeholders</b>			
<b>Your Stakeholders</b>	<b>What you want to tell them:</b>	<b>What you want them to tell you:</b>	<b>How to communicate with/tell them:</b>
(Example) Employees	Environmental policy	How to get it done	Memo, bulletin board, meetings, suggestion box
(Example) Neighbors	Environmental policy and EMS plans	Their environmental concerns	Meetings, open house, flyers, suggestion box
Date Completed: _____		Contact Person: _____	

Worksheet 4-2: Communication Work Plan					
Target Audience	What to Communicate	Mode of Communication	When	Budget	Who is Responsible
Sample: Staff	Environmental Policy	Newsletter Staff Meetings	Monthly Weekly	? ?	? ?

Date Completed: \_\_\_\_\_ Contact Person: \_\_\_\_\_

Worksheet 4-3: Documentation							
List Existing Documents	Determine Format: Who/ Date Completed	Develop Prototype (Content): Who/ Date Completed	Assign Writing: Who/ Date	Review Writing/ Compare to Prototype Who/ Date	Added to Document List/ Date	Who has access	Where Located
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
List Documents to be Created							
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
Date Completed: _____ Contact Person: _____							

## Estimating Resources and Schedules

If you have never developed an EMS before, estimating resources and time can be very difficult. There is no magic formula. Even in the smallest organization, some estimate of people resources and other costs, together with a schedule of milestones and decision points, will be needed.

One way to begin is to create a schedule and estimate resources for completing the modules in this manual. Other steps can be added as needed. As you begin to work on each module, you may want to identify intermediate steps for which you will set additional target completion dates. At some points, you may need to alter the overall schedule. Below is a worksheet to assist you in developing and tracking this plan. As you go through each module, revisit this worksheet and list who is participating in each task and your estimated budget and schedule. Also, below is a worksheet to help you identify the persons responsible for different parts of the EMS and the resources needed to support their effort.

<b>Worksheet 4-4: Persons Responsible for DfE/EMS Development</b>			
<b>Roles</b>	<b>Individual Responsible</b>	<b>% of Time Designated</b>	<b>Budget</b>
“Management representative” having responsibility for implementing the EMS (in a small business, this person could be the owner).			
Identifying and determining significance of environmental aspects.			
Identifying and determining applicability of legal and other requirements.			
Competency-based training.			
Operational controls.			
Emergency preparedness and response.			
Monitoring and measurement of “key characteristics” of operations and activities that can have significant environmental impacts (i.e., the “significant environmental aspects.”).			
Periodic evaluations of environmental compliance.			
Handling and investigating non-conformance with the EMS.			
Records management.			
Internal EMS audits.			



**Worksheet 4-5: DfE/EMS Development Schedule and Resources Worksheet**

<b>Module</b>	<b>Participants</b>	<b>Budget</b>	<b>Target Completion</b>
Planning the Process: Decision Points, Leadership & Participants, Schedule & Plan			
Intermediate steps: (Fill in)			
Understanding What Your Company Does and Its Possible Impacts: Identifying environmental aspects			
Intermediate steps: (Fill in)			
Determining Significant Aspects: Prioritizing and Setting Objectives			
Intermediate steps: (Fill in)			
Making Improvements: Evaluating Alternatives and Setting Targets			
Intermediate steps: (Fill in)			
Setting Standards: Developing Operational Controls			
Intermediate steps: (Fill in)			
Setting Up Environmental Management Projects; Measuring and Achieving Success			
Intermediate steps: (Fill in)			
Establishing Continuing Improvement: Your EMS Program, Audits, and Management Review			
Intermediate steps: (Fill in)			
Date Completed: _____ Contact Person: _____			